

1 **SHANNON G. SPLAINE, ESQ.**  
2 Nevada Bar No. 8241  
3 **LINCOLN, GUSTAFSON & CERCOS, LLP**  
4 3960 Howard Hughes Parkway  
5 Suite 200  
6 Las Vegas, NV 89169  
7 Telephone: (702) 257-1997  
8 Facsimile: (702) 257-2203  
9 ssplaine@lgclawoffice.com

10 Attorneys for Defendant,  
11 Credit Adjustments, Inc.

12 **UNITED STATES DISTRICT COURT**  
13 **DISTRICT OF NEVADA**

14 JAMIE HALIBURTON,  
15  
16 Plaintiff,

17 vs.

18 CREDIT ADJUSTMENT, INC.  
19  
20 Defendant.

Case No: 2:18-cv-00847-GMN-CWH

**STIPULATION TO EXTEND TIME  
TO RESPOND TO COMPLAINT**

21 NOW INTO COURT, through undersigned counsel, comes plaintiff, Jamie  
22 Haliburton ("Plaintiff"), and Defendant, Credit Adjustments, Inc. ("CAI"), who file this  
23 Joint Stipulation to Extend the Answer deadline to the Complaint filed by Plaintiff, and  
24 state:

- 25 1. On or about May 11, 2018, Plaintiff filed his Complaint in this Honorable  
26 Court.
- 27 2. On May 18, 2018, Plaintiff served his Complaint on CAI.
- 28 3. CAI's current response deadline is June 6, 2018.

1           4.     Plaintiff, through counsel, has agreed to allow CAI a 21-day extension, or  
2 until June 29, 2018, to file Responsive Pleadings to Plaintiff's Complaint.

3  
4           5.     CAI has not requested any prior extensions in this action.

5           6.     There are no pending hearings or matters currently before the Court.

6           7.     Despite due diligence and good faith efforts, CAI and its counsel require  
7 an extension of time to investigate the allegations in the Complaint, and prepare a  
8 responsive pleading. In addition, the parties are currently discussing an early resolution  
9 of this matter, and the additional time will allow the parties sufficient time to explore  
10 such a resolution.  
11

12  
13           WHEREFORE, Defendant, Credit Adjustments, Inc., respectfully requests this  
14 Court grant an extension through and including June 29, 2018, to file its responsive  
15 pleadings to Plaintiff's Complaint.  
16

17 Dated: June 8, 2018

18  
19 /s/ David H. Krieger

/s/ Shannon G. Splaine

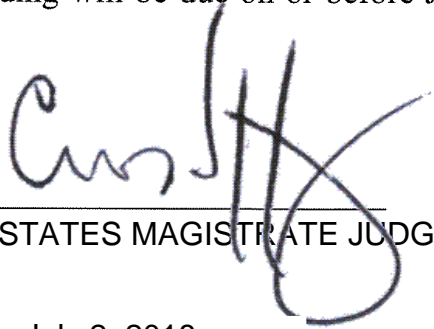
20 \_\_\_\_\_  
21 David H. Krieger, Esq.  
22 (NV Bar No. 9086)  
23 HAINES & KRIEGER, LLC  
24 8985 S. Eastern Ave, Suite 350  
Henderson, NV 89123  
Telephone: (702) 880-5554  
[dkrieger@hainesandkrieger.com](mailto:dkrieger@hainesandkrieger.com)

\_\_\_\_\_  
Shannon G. Splaine, Esq.  
(NV Bar No. 8241)  
LINCOLN, GUSTAFSON & CERCOS, LLP  
3960 Howard Hughes Parkway, Suite 200  
Las Vegas, NV 89169  
Telephone: (702) 257-1997  
[ssplaine@lgclawoffice.com](mailto:ssplaine@lgclawoffice.com)

25 Attorneys for Plaintiff Jamie  
26 Haliburton  
27  
28

Attorneys for Defendant,  
Credit Adjustments, Inc.

1 Good cause being shown, CAI's responsive pleading will be due on or before June 29,  
2 2018. IT IS SO ORDERED.



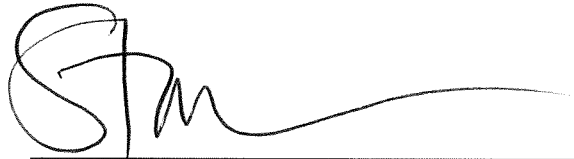
UNITED STATES MAGISTRATE JUDGE

DATED: July 2, 2018

**CERTIFICATE OF SERVICE**

I certify that on this 8<sup>th</sup> day of June, 2018, a copy of the foregoing was filed electronically in the ECF system. Notice of this filing will be sent to the parties of record by operation of the Court's electronic filing system, including Plaintiff's counsel as described below. Parties may access this filing through the Court's system.

David H. Krieger, Esq.  
HAINES & KRIEGER, LLC  
8985 S. Eastern Ave, Suite 350  
Henderson, NV 89123

A handwritten signature in black ink, appearing to read 'Staci D. Ibarra', written over a horizontal line.

Staci D. Ibarra, an employee  
of THE LAW OFFICES OF  
LINCOLN, GUSTAFSON & CERCOS, LLP